COMMITMENT & INTEGRITY DRIVE RESULTS

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March 30, 2011

Ms. Kimberly Tisa
PCB Coordinator
U.S. Environmental Protection Agency Region 1
5 Post Office Square – Suite 100
Boston, Massachusetts 02109-3912

Re: PCB Remediation Plan Modification Request No. 5
Peabody Terrace Housing Facility – Buildings A, B & C Soil Removal
900 Memorial Drive, Cambridge, Massachusetts

Dear Ms. Tisa:

On behalf of the President and Fellows of Harvard College (Harvard), Woodard & Curran has prepared this modification request to the Notification¹ in accordance with Condition 17 of the United States Environmental Protection Agency's (EPA) April 15, 2010 Risk-Based PCB Cleanup and Disposal Approval under 40 CFR 761.61(c) and 761.79(h) (the Approval) for the Peabody Terrace Housing Complex in Cambridge, Massachusetts (the site). This modification request concerns the soil removal work at Buildings A, B, and C, which is currently being performed in accordance with the Soil Remediation Plan submitted to EPA on November 11, 2010 (Modification Request No. 2) and approved by EPA on December 14, 2010.

The Soil Remediation Plan proposed the removal and off-site disposal of site soils containing PCBs above the unrestricted use cleanup level of 1 part per million (ppm), consistent with 40 CFR 761.61. The areas subject to soil removal based on the characterization data are depicted on Figure 3-1 in the Soil Remediation Plan, and a proposed soil verification plan is depicted on Figure 3-2.

Soil excavation work began along the east side of Building A on February 22, 2011. As the removal work proceeded along this building side, the subsurface root balls present at the base of several substantial and well-established trees were exposed and observed to be substantial in extent. The Remediation Contractor used best efforts to remove soils from the rootball (hand digging, pick axe, excavator bucket); however, the root ball mass was very well established and digging was extremely difficult.

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¹ The Notification consists of the information submitted by Woodard & Curran to satisfy the requirements under 40 CFR 761.61(c), 761.62, and 761.79(h). Information provided was dated February 16, 2010 (Building A Plan); April 6, 2010 (Buildings B, C, X Plan); April 9, 2010 (e-mail clarification); April 29, 2010 (certifications); May 13, 2010 (contractor workplan); June 2, 2010 (response contractor workplan comments); July 21, 2010 (Modification Request No. 1 - Powerwashing); November 11, 2010 (Modification Request No. 2 – Soil Remediation – Buildings A, B, and C); November 11, 2010 with revision on November 18, 2010 (Modification Request No. 3 – Patio Coatings); and February 16, 2011 (Modification Request No. 4 – PCB Remediation Plan Modification – Buildings E, F, and Y).



In addition, the excavation around the root balls extended beyond the tree's canopy in some areas and there was a concern with safety and of the tree uprooting and falling (potentially onto Putnam Avenue on this side of the building). Based on these concerns, the Contractor informed the project team that additional excavation could not be performed in this area for these reasons without first removing the trees.

To support this conclusion, a certified arborist inspected the exposed root balls of four trees along the east side of Building A on March 9, 2011, and indicated that additional soil removal would also compromise the trees' likelihood of survival (see attached letter). It is also anticipated that similar situations will arise during the excavation around several other well-established trees within the proposed excavation areas.

Given these conditions, soil samples were collected within the root ball to determine PCB concentrations within the root ball mass. Four samples collected from the surface of root balls (approximately 4 to 6 inches below the former ground surface) east of Building A were reported with PCBs at 4.29, 5.93, 6.33, and 7.96 ppm; four additional samples were collected at a depth of 12 inches below the exposed root ball surface, and were reported with PCBs at 1.58, 1.96, 2.22, and 5.17 ppm. This data indicated that all sample results were < 10 ppm and there was a decreasing concentration profile with increasing depth; similar to the contaminant profile in soils outside of the root ball mass.

For the following reasons, an alternate remedial action that "will not pose an unreasonable risk of injury to health or the environment" per 40 CFR 761.61(c) is being proposed:

- additional soils cannot be removed from the root ball mass without removing the trees; these
 trees are well established and an important part of the Peabody Terrace complex as well as
 this area of Cambridge and should not be removed;
- residual levels of PCBs above 1 ppm are present in the root ball mass;
- a standard "cap" consistent with 40 CFR 761.61(a)(7) cannot be constructed given the need to allow water infiltration to the root ball mass to support the tree's survival.

Given that the proposed remedial method would not be able to limit infiltration, an assessment of the vertical migration potential for the residual PCBs in the root mass was performed. Following excavation, a sample of the base soils (24 inch depth) was collected for grain size and sieve analyses. The results indicated that the soil was 68% fines (e.g., silt/clay), 32% sands and < 1% gravel (see attached laboratory report). This type of material would limit vertical migration given its lower permeability compared to a sandier or gravel matrix. This condition is supported by the post excavation sample results received to date, which indicate that 89% (56 of 63 samples) were either non-detect or detected PCBs at < 1 ppm. These data support the condition that vertical migration of PCBs through the rootball should not be a primary concern.

Therefore, the primary design criteria for the remedial method are to prevent or minimize human exposure and erosion. A colored nonwoven geotextile fabric was selected as a "demarcating barrier" as it would allow infiltration, but also serve as a visual barrier to anyone who may disrupt surface soils over the fabric in the future. This fabric would then be covered by new materials (soils or landscaping materials) to a minimum depth of 6 inches.

Prior to preparation of this modification, this approach was discussed during our phone conversation on March 21, 2011 and conceptually agreed. The specific alternate approach to manage the soils in-place where they are present within the root balls of well-established trees is outlined below.

Proposed Modification Request

This modification request is proposed to be implemented in areas where additional removal of soils within root balls cannot be completed at the proposed excavation depths given the rationale presented above.

The following actions will be performed at tree root balls to be left in place:



- Surface soils will be removed to the maximum extent practical over the surface and around the outer perimeter of the root ball consistent with the current excavation plan;
- Soil samples will be collected within the root balls at or near the locations indicated on Figure 3-2 of the Soil Remediation Plan (Proposed Verification Sample Locations) to a depth of 3 inches below the newly exposed soil surface to document the concentrations of PCBs in soil that will be managed in place;
- After trimming the roots and backfilling loam within the root ball for stabilization, a colored nonwoven geotextile fabric will be installed over the root ball mass. The selected fabric is Mirafi 140NL/O, an orange nonwoven geotextile composed of polypropylene fibers which is a chemically resistant fabric inert to biological degradation (see attached specification);
- A minimum of six inches of material (soil or landscape material) will be installed over the surface of the fabric;
- The locations of these root balls and fabric placement will be provided with the completion report for the soil work; areas with PCBs in root ball soils > 1 and < 10 ppm will be included in the overall deed notice that will be completed for the site at the end of the remediation activities.

If you have any comments, questions, or require further information, please do not hesitate to contact me at the number listed above.

Sincerely,

WOODARD & CURRAN INC.

Jeffrey Hamel, LSP, LEP Senior Vice President

Enclosures: Cambridge Landscape Co. Inc. letter – March 16, 2011

Mirafi 140NL/O Technical Specification Alpha Analytical laboratory report L1103670

cc: Karen Sardone, Harvard Chris Packard, JLL

Cambridge Landscape Co. Inc.

100 Smith Place, Cambridge, MA 02138 (617) 661-8591 Fax (617) 661-3900

Lee Phelps Harvard Real Estate Services 20 Prescott Street Cambridge MA 02138

March 16, 2011

Observations of March 9, 2011:

The soil removed from around the trees is the maximum amount I would recommend. Getting any closer could result in failure of the trees to survive and/or fall over.

Good soil should be spread around the expose roots after they have been cut with loppers or a shape saw.

At the completion of the job the trees should be pruned to compensate for root loss and deep root fertilized to encourage root growth.

Sincerely

Paul Harlow

Massachusetts Certified Arborist # 1227





Mirafi® 140NL/O

Mirafi[®] 140NL/O is an orange nonwoven geotextile composed of polypropylene fibers, which are formed into a network such that the fibers retain their relative position. Mirafi[®] 140NL/O is inert to biological degradation and resists naturally encountered chemicals, alkalis, and acids.

Machanical Dramatica	Took Mathad	l lesi4	Typical Value		
Mechanical Properties	Test Method	Unit	MD	CD	
Grab Tensile Strength	ASTM D 4632	N (lbs)	445 (100)	445 (100)	
Grab Tensile Elongation	ASTM D 4632	%	75	75	
Trapezoid Tear Strength	ASTM D 4533	N (lbs)	223 (50) 223 (50		
CBR Puncture Strength	ASTM D 6241	N (lbs)	1380 (310)		
Apparent Opening Size (AOS) ¹	ASTM D 4751	mm	0.212		
Apparent Opening Size (AOS)		(U.S. Sieve)	(70)		
Permittivity	ASTM D 4491	sec ⁻¹	2	.4	
Flow Rate	ASTM D 4491	l/min/m ²			
Flow Nate	A31101 D 4491	(gal/min/ft ²)	(175)		
UV Resistance (at 500 hours)	ASTM D 4355	% strength retained	7	0	

¹ ASTM D 4751: AOS is a Maximum Opening Diameter Value

Physical Properties	Test Method	Unit	Typical Value
Weight	ASTM D 5261	g/m² (oz/yd²)	129 (3.8)
Thickness	ASTM D 5199	mm (mils)	0.9 (35)
Roll Dimensions (width x length)		m (ft)	4.5 x 110 (15 x 360)
Roll Area		$m^2 (yd^2)$	502 (600)
Estimated Roll Weight		kg (lb)	65 (143)

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ANALYTICAL REPORT

Lab Number: L1103670

Client: Woodard & Curran

35 New England Business Center Drive

Suite 180

Andover, MA 01810

ATTN: Amy Wallace Phone: (978) 557-8150

Project Name: PEABODY TERRACE

Project Number: 210980 Report Date: 03/23/11

The original project report/data package is held by Alpha Analytical. This report/data package is paginated and should be reproduced only in its entirety. Alpha Analytical holds no responsibility for results and/or data that are not consistent with the original.

Certifications & Approvals: MA (M-MA086), NY NELAC (11148), CT (PH-0574), NH (2003), NJ (MA935), RI (LAO00065), ME (MA0086), PA (Registration #68-03671), USDA (Permit #S-72578), US Army Corps of Engineers, Naval FESC.

Eight Walkup Drive, Westborough, MA 01581-1019 508-898-9220 (Fax) 508-898-9193 800-624-9220 - www.alphalab.com



Project Name:PEABODY TERRACELab Number:L1103670

Project Number: 210980 Report Date: 03/23/11

Alpha Sample Collection Sample ID Client ID Sample Location Date/Time

L1103670-01 PTA-CBS-E-1391 CAMBRIDGE, MA 03/18/11 12:45

Project Name: PEABODY TERRACE Lab Number: L1103670

Project Number: 210980 Report Date: 03/23/11

Case Narrative

The samples were received in accordance with the Chain of Custody and no significant deviations were encountered during the preparation or analysis unless otherwise noted. Sample Receipt, Container Information, and the Chain of Custody are located at the back of the report.

Results contained within this report relate only to the samples submitted under this Alpha Lab Number and meet all of the requirements of NELAC, for all NELAC accredited parameters. The data presented in this report is organized by parameter (i.e. VOC, SVOC, etc.). Sample specific Quality Control data (i.e. Surrogate Spike Recovery) is reported at the end of the target analyte list for each individual sample, followed by the Laboratory Batch Quality Control at the end of each parameter. If a sample was re-analyzed or re-extracted due to a required quality control corrective action and if both sets of data are reported, the Laboratory ID of the re-analysis or re-extraction is designated with an "R" or "RE", respectively. When multiple Batch Quality Control elements are reported (e.g. more than one LCS), the associated samples for each element are noted in the grey shaded header line of each data table. Any Laboratory Batch, Sample Specific % recovery or RPD value that is outside the listed Acceptance Criteria is bolded in the report. Definitions of all data qualifiers and acronyms used in this report are provided in the Glossary located at the back of the report.

Please see the associated ADEx data file for a comparison of laboratory reporting limits that were achieved with the regulatory Numerical Standards requested on the Chain of Custody.

For additional information, please contact Client Services at 800-624-9220.

Grain Size

The WG459694-1 Laboratory Duplicate RPD, performed on L1103670-01, is outside the acceptance criteria for % Fine Gravel (77%) and % Coarse Sand (38%). The elevated RPD has been attributed to the non-homogeneous nature of the sample utilized for the laboratory duplicate.

I, the undersigned, attest under the pains and penalties of perjury that, to the best of my knowledge and belief and based upon my personal inquiry of those responsible for providing the information contained in this analytical report, such information is accurate and complete. This certificate of analysis is not complete unless this page accompanies any and all pages of this report.

Cypthia fin Chen. Cynthia McQueen

Authorized Signature:

Title: Technical Director/Representative

Date: 03/23/11



INORGANICS & MISCELLANEOUS



Project Name: PEABODY TERRACE

Lab Number: L11

L1103670

Project Number: 210980

Report Date: 03/23/11

SAMPLE RESULTS

Lab ID: L1103670-01

Client ID: PTA-CBS-E-1391
Sample Location: CAMBRIDGE, MA

Matrix: Soil

Date Collected: 03/18/11 12:45

Date Received: 03/21/11

Field Prep: Not Specified

Parameter	Result	Qualifier	Units	RL	MDL	Dilution Factor	Date Prepared	Date Analyzed	Analytical Method	Analyst
Grain Size Analysis - I	Mansfield Lab									
Cobbles	ND		%	0.100	NA	1	-	03/22/11 00:00	12,D422	SE
% Coarse Gravel	ND		%	0.100	NA	1	-	03/22/11 00:00	12,D422	SE
% Fine Gravel	0.800		%	0.100	NA	1	-	03/22/11 00:00	12,D422	SE
% Coarse Sand	2.20		%	0.100	NA	1	-	03/22/11 00:00	12,D422	SE
% Medium Sand	8.10		%	0.100	NA	1	-	03/22/11 00:00	12,D422	SE
% Fine Sand	21.2		%	0.100	NA	1	-	03/22/11 00:00	12,D422	SE
% Total Fines	67.7		%	0.100	NA	1	-	03/22/11 00:00	12,D422	SE



Lab Duplicate Analysis Batch Quality Control

Project Name: PEABODY TERRACE

Project Number: 210980

Lab Number: L1103670 **Report Date:** 03/23/11

arameter	Native Sample	Duplicate Sample	Units	RPD	Qual	RPD Limits
rain Size Analysis - Mansfield Lab Associated sample(s): 01 QC Batch ID	: WG459694-1 QC Sampl	e: L1103670-0	1 Client I	D: PTA-C	BS-E-1391
Cobbles	ND	ND	%	NC		20
% Coarse Gravel	ND	ND	%	NC		20
% Fine Gravel	0.8	1.80	%	77	Q	20
% Coarse Sand	2.2	1.50	%	38	Q	20
% Medium Sand	8.1	7.60	%	6		20
% Fine Sand	21.2	17.5	%	19		20
% Total Fines	67.7	71.6	%	6		20

Project Name: PEABODY TERRACE Lab Number: L1103670

Project Number: 210980 Report Date: 03/23/11

Sample Receipt and Container Information

Were project specific reporting limits specified?

Reagent H2O Preserved Vials Frozen on: NA

Cooler Information Custody Seal

Cooler

A Absent

Container Information Temp deg C Pres Seal Analysis(*) **Container ID Container Type** Cooler pН L1103670-01A Amber 1000ml unpreserved Α N/A 2 Υ Absent A2-HYDRO-TFINE(),A2-HYDRO-CGRAVEL(), A2-HYDRO-FSAND(),A2-HYDRO-MSAND(),A2-HYDRO-CSAND(),A2-HYDRO-COBBLES(),A2-HYDRO-FGRAVEL()

Project Name:PEABODY TERRACELab Number:L1103670Project Number:210980Report Date:03/23/11

GLOSSARY

Acronyms

EPA - Environmental Protection Agency.

LCS · Laboratory Control Sample: A sample matrix, free from the analytes of interest, spiked with verified known amounts of analytes or a material containing known and verified amounts of analytes.

LCSD · Laboratory Control Sample Duplicate: Refer to LCS.

MDL • Method Detection Limit: This value represents the level to which target analyte concentrations are reported as estimated values, when those target analyte concentrations are quantified below the reporting limit (RL). The MDL includes any adjustments from dilutions, concentrations or moisture content, where applicable.

MS • Matrix Spike Sample: A sample prepared by adding a known mass of target analyte to a specified amount of matrix sample for which an independent estimate of target analyte concentration is available.

MSD · Matrix Spike Sample Duplicate: Refer to MS.

NA · Not Applicable.

NC • Not Calculated: Term is utilized when one or more of the results utilized in the calculation are non-detect at the parameter's reporting unit.

NI · Not Ignitable.

RL - Reporting Limit: The value at which an instrument can accurately measure an analyte at a specific concentration. The RL includes any adjustments from dilutions, concentrations or moisture content, where applicable.

RPD - Relative Percent Difference: The results from matrix and/or matrix spike duplicates are primarily designed to assess the precision of analytical results in a given matrix and are expressed as relative percent difference (RPD). Values which are less than five times the reporting limit for any individual parameter are evaluated by utilizing the absolute difference between the values; although the RPD value will be provided in the report.

Terms

Analytical Method: Both the document from which the method originates and the analytical reference method. (Example: EPA 8260B is shown as 1,8260B.) The codes for the reference method documents are provided in the References section of the Addendum.

Data Qualifiers

- A Spectra identified as "Aldol Condensation Product".
- The analyte was detected above the reporting limit in the associated method blank. Flag only applies to associated field samples that have detectable concentrations of the analyte at less than five times (5x) the concentration found in the blank. For MCP-related projects, flag only applies to associated field samples that have detectable concentrations of the analyte at less than ten times (10x) the concentration found in the blank. For DOD-related projects, flag only applies to associated field samples that have detectable concentrations of the analyte at less than ten times (10x) the concentration found in the blank AND the analyte was detected above one-half the reporting limit (or above the reporting limit for common lab contaminants) in the associated method blank.
- **D** Concentration of analyte was quantified from diluted analysis. Flag only applies to field samples that have detectable concentrations of the analyte.
- ${\bf E} \qquad \hbox{-Concentration of analyte exceeds the range of the calibration curve and/or linear range of the instrument.}$
- G The concentration may be biased high due to matrix interferences (i.e, co-elution) with non-target compound(s). The result should be considered estimated.
- H -The analysis of pH was performed beyond the regulatory-required holding time of 15 minutes from the time of sample collection.
- The RPD between the results for the two columns exceeds the method-specified criteria; however, the lower value has been reported due to obvious interference.
- P The RPD between the results for the two columns exceeds the method-specified criteria.
- The quality control sample exceeds the associated acceptance criteria. Note: This flag is not applicable for matrix spike recoveries when the sample concentration is greater than 4x the spike added or for batch duplicate RPD when

Report Format: Data Usability Report



Project Name:PEABODY TERRACELab Number:L1103670Project Number:210980Report Date:03/23/11

Data Qualifiers

the sample concentrations are less than 5x the RL. (Metals only.)

R - Analytical results are from sample re-analysis.

RE - Analytical results are from sample re-extraction.

J Estimated value. This represents an estimated concentration for Tentatively Identified Compounds (TICs).

ND • Not detected at the reporting limit (RL) for the sample.

Report Format: Data Usability Report



Project Name:PEABODY TERRACELab Number:L1103670Project Number:210980Report Date:03/23/11

REFERENCES

12 Annual Book of ASTM Standards. American Society for Testing and Materials.

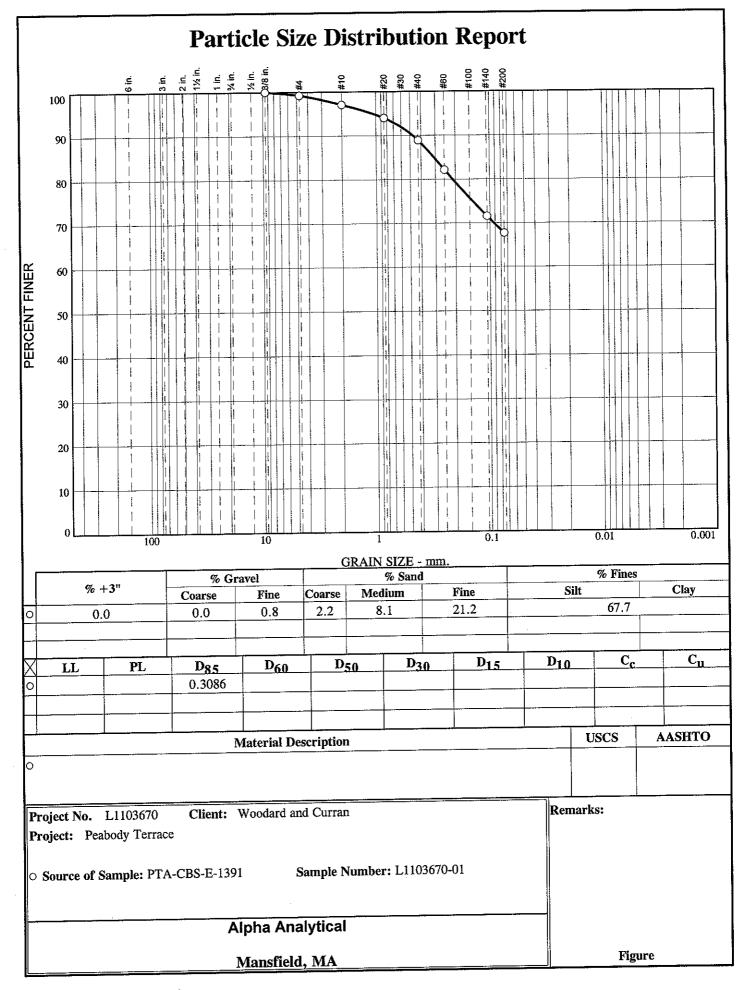
LIMITATION OF LIABILITIES

Alpha Analytical performs services with reasonable care and diligence normal to the analytical testing laboratory industry. In the event of an error, the sole and exclusive responsibility of Alpha Analytical shall be to re-perform the work at it's own expense. In no event shall Alpha Analytical be held liable for any incidental, consequential or special damages, including but not limited to, damages in any way connected with the use of, interpretation of, information or analysis provided by Alpha Analytical.

We strongly urge our clients to comply with EPA protocol regarding sample volume, preservation, cooling, containers, sampling procedures, holding time and splitting of samples in the field.



ASTM D422-63 Grain Size Analysis



GRAIN SIZE DISTRIBUTION TEST DATA

3/22/2011

Client: Woodard and Curran Project: Peabody Terrace Project Number: L1103670 Location: PTA-CBS-E-1391 Sample Number: L1103670-01

Sieve Test Data

Post #200 Wash Test Weights (grams):

Dry Sample and Tare = 59.36 Tare Wt. =7.40 Minus #200 from wash = 63.6%

Dry Sample and Tare (grams)	Tare (grams)	Sieve Opening Size	Weight Retained (grams)	Sieve Weight (grams)	Percent Finer
142.66	0.00	.375	553.70	553.70	100.0
		#4	527.99	526.88	99.2
		#10	495.99	492.89	97.0
		#20	427.34	422.95	94.0
		#40	381.62	374.39	88.9
		#60	369.95	360.36	82.2
		#140	351.88	336.77	71.6
		#200	347.82	342.26	67.7

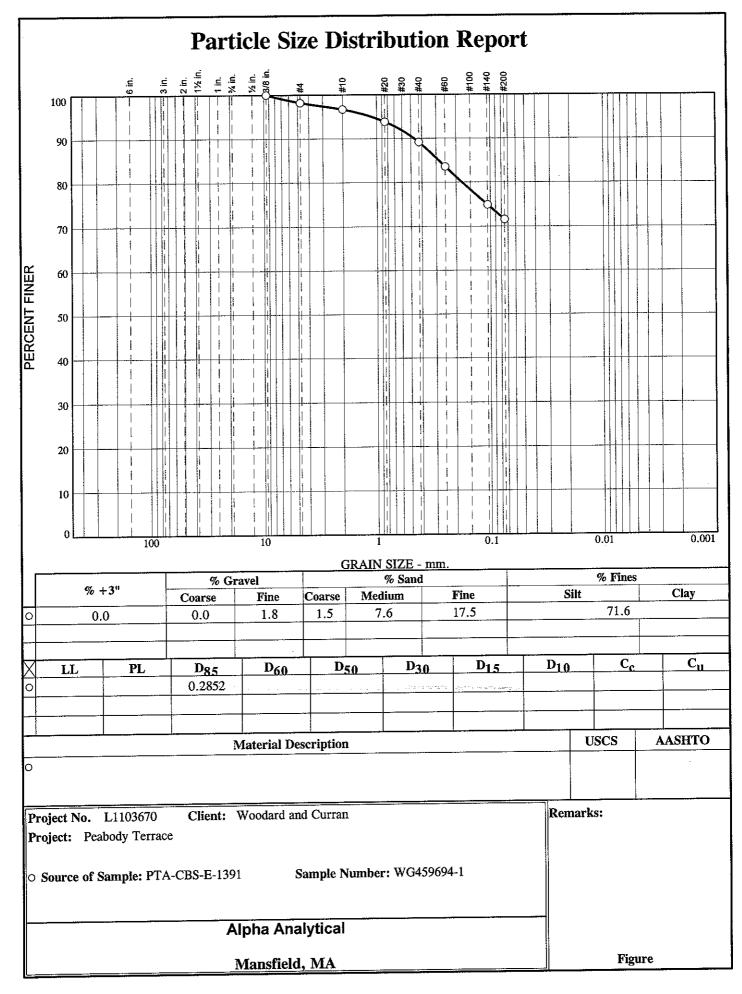
Fractional Components

		Gravel		Sand					Fines	
Cobbles	Coarse	Fine	Total	Coarse	Medium	Fine	Total	Silt	Clay	Total
0.0	0.0	0.8	0.8	2.2	8.1	21.2	31.5			67.7

D ₁₀	D ₁₅	D ₂₀	D ₃₀	D ₅₀	D ₆₀	D ₈₀	D ₈₅	D ₉₀	D ₉₅
						0.2117	0.3086	0.4741	1.0739

Fineness Modulus
0.56

_ Alpha Analytical



GRAIN SIZE DISTRIBUTION TEST DATA

3/22/2011

Client: Woodard and Curran Project: Peabody Terrace Project Number: L1103670 Location: PTA-CBS-E-1391 Sample Number: WG459694-1

Sieve Test Data

Post #200 Wash Test Weights (grams):

Dry Sample and Tare = 58.63 Tare Wt. =7.42 Minus #200 from wash = 69.7%

Dry Sample and Tare (grams)	Tare (grams)	Sieve Opening Size	Weight Retained (grams)	Sieve Weight (grams)	Percent Finer
169.24	0.00	.375	553.70	553.70	100.0
		#4	529.89	526.88	98.2
		#10	495.50	492.89	96.7
		#20	427.79	422.95	93.8
		#40	382.30	374.39	89.1
		#60	369.82	360.36	83.6
		#140	351.41	336.77	74.9
		#200	347.90	342.26	71.6

Fractional Components

G-1333		Gravel			Sand				Fines		
Cobbles	Coarse	Fine	Total	Coarse	Medium	Fine	Total	Silt	Clay	Total	
0.0	0.0	1.8	1.8	1.5	7.6	17.5	26.6			71.6	

D ₁₀	D ₁₅	D ₂₀	D ₃₀	D ₅₀	D ₆₀	D ₈₀	D ₈₅	D ₉₀	D ₉₅
						0.1780	0.2852	0.4683	1.1199

Alpha Analytical

Certificate/Approval Program Summary

Last revised February 23, 2011 - Westboro Facility

The following list includes only those analytes/methods for which certification/approval is currently held. For a complete listing of analytes for the referenced methods, please contact your Alpha Customer Service Representative.

Connecticut Department of Public Health Certificate/Lab ID: PH-0574. NELAP Accredited Solid Waste/Soil.

Drinking Water (Inorganic Parameters: Color, pH, Turbidity, Conductivity, Alkalinity, Chloride, Free Residual Chlorine, Fluoride, Calcium Hardness, Sulfate, Nitrate, Nitrite, Aluminum, Antimony, Arsenic, Barium, Beryllium, Cadmium, Calcium, Chromium, Copper, Iron, Lead, Magnesium, Manganese, Mercury, Molybdenum, Nickel, Potassium, Selenium, Silver, Sodium, Thallium, Vanadium, Zinc, Total Dissolved Solids, Total Organic Carbon, Total Cyanide, Perchlorate. Organic Parameters: Volatile Organics 524.2, Total Trihalomethanes 524.2, 1,2-Dibromo-3-chloropropane (DBCP), Ethylene Dibromide (EDB), 1,4-Dioxane (Mod 8270). Microbiology Parameters: Total Coliform-MF mEndo (SM9222B), Total Coliform – Colilert (SM9223 P/A), E. Coli. – Colilert (SM9223 P/A), HPC – Pour Plate (SM9215B), Fecal Coliform – MF m-FC (SM9222D))

Wastewater/Non-Potable Water (Inorganic Parameters: Color, pH, Conductivity, Acidity, Alkalinity, Chloride, Total Residual Chlorine, Fluoride, Total Hardness, Silica, Sulfate, Sulfide, Ammonia, Kjeldahl Nitrogen, Nitrate, Nitrite, O-Phosphate, Total Phosphorus, Aluminum, Antimony, Arsenic, Barium, Beryllium, Boron, Cadmium, Calcium, Chromium, Hexavalent Chromium, Cobalt, Copper, Iron, Lead, Magnesium, Manganese, Mercury, Molybdenum, Nickel, Potassium, Selenium, Silver, Sodium, Strontium, Thallium, Tin, Titanium, Vanadium, Zinc, Total Residue (Solids), Total Dissolved Solids, Total Suspended Solids (non-filterable), BOD, CBOD, COD, TOC, Total Cyanide, Phenolics, Foaming Agents (MBAS), Bromide, Oil and Grease. Organic Parameters: PCBs, Organochlorine Pesticides, Technical Chlordane, Toxaphene, 2,4-D, 2,4,5-T, 2,4,5-TP(Silvex), Acid Extractables (Phenols), Benzidines, Phthalate Esters, Nitrosamines, Nitroaromatics & Isophorone, Polynuclear Aromatic Hydrocarbons, Haloethers, Chlorinated Hydrocarbons, Volatile Organics, TPH (HEM/SGT), Extractable Petroleum Hydrocarbons (ETPH), MA-EPH, MA-VPH. Microbiology Parameters: Total Coliform – MF mEndo (SM9222B), Total Coliform – MTF (SM9221B), HPC – Pour Plate (SM9215B), Fecal Coliform – MF m-FC (SM9222D), Fecal Coliform – A-1 Broth (SM9221E).)

Solid Waste/Soil (Inorganic Parameters: pH, Sulfide, Aluminum, Antimony, Arsenic, Barium, Beryllium, Boron, Cadmium, Calcium, Chromium, Hexavalent Chromium, Cobalt, Copper, Iron, Lead, Magnesium, Manganese, Mercury, Molybdenum, Nickel, Potassium, Selenium, Silver, Sodium, Thallium, Tin, Vanadium, Zinc, Total Cyanide, Ignitability, Phenolics, Corrosivity, TCLP Leach (1311), SPLP Leach (1312 metals only), Reactivity. Organic Parameters: PCBs, PCBs in Oil, Organochlorine Pesticides, Technical Chlordane, Toxaphene, Extractable Petroleum Hydrocarbons (ETPH), MA-EPH, MA-VPH, Dicamba, 2,4-D, 2,4,5-T, 2,4,5-TP(Silvex), Volatile Organics, Acid Extractables (Phenols), 3.3'-Dichlorobenzidine, Phthalates, Nitrosamines, Nitroaromatics & Cyclic Ketones, PAHs, Haloethers, Chlorinated Hydrocarbons.)

Maine Department of Human Services Certificate/Lab ID: 2009024.

Drinking Water (Inorganic Parameters: SM9215B, 9222D, 9223B, EPA 180.1, 353.2, SM2130B, 2320B, 4500Cl-D, 4500CN-C, 4500CN-E, 4500F-C, 4500H+B, 4500NO3-F, EPA 200.7, EPA 200.8, 245.1, EPA 300.0. Organic Parameters: 504.1, 524.2.)

Wastewater/Non-Potable Water (Inorganic Parameters: EPA 120.1, 1664A, 350.1, 351.1, 353.2, 410.4, 420.1, SM2320B, 2510B, 2540C, 2540D, 426C, 4500Cl-D, 4500Cl-E, 4500CN-C, 4500CN-E, 4500F-B, 4500F-C, 4500H+B, 4500Norg-B, 4500Norg-C, 4500NH3-B, 4500NH3-H, 4500NO3-F, 4500P-B, 4500P-B, 5210B, 5220D, 5310C, EPA 200.7, 200.8, 245.1. Organic Parameters: 608, 624, ME-DRO, ME-GRO, MA-EPH, MA-VPH.)

Solid Waste/Soil (Organic Parameters: ME-DRO, ME-GRO, MA-EPH, MA-VPH.)

Massachusetts Department of Environmental Protection Certificate/Lab ID: M-MA086.

Drinking Water (Inorganic Parameters: (EPA 200.8 for: Sb,As,Ba,Be,Cd,Cr,Cu,Pb,Ni,Se,TI) (EPA 200.7 for: Ba,Be,Ca,Cd,Cr,Cu,Na,Ni) 245.1, (300.0 for: Nitrate-N, Fluoride, Sulfate); (EPA 353.2 for: Nitrate-N, Nitrite-N); (SM4500NO3-F for: Nitrate-N and Nitrite-N); 4500F-C, 4500CN-CE, EPA 180.1, SM2130B, SM4500Cl-D, 2320B, SM2540C, SM4500H-B. Organic Parameters: (EPA 524.2 for: Trihalomethanes, Volatile Organics); (504.1 for: 1,2-Dibromoethane, 1,2-Dibromo-3-Chloropropane), EPA 332. Microbiology Parameters: SM9215B; ENZ. SUB. SM9223; ColilertQT SM9223B; MF-SM9222D.)

Non-Potable Water (Inorganic Parameters:, (EPA 200.8 for: AI,Sb,As,Be,Cd,Cr,Cu,Pb,Mn,Ni,Se,Ag,TI,Zn); (EPA 200.7 for: AI,Sb,As,Be,Cd,Ca,Cr,Co,Cu,Fe,Pb,Mg,Mn,Mo,Ni,K,Se,Ag,Na,Sr,Ti,TI, V,Zn); 245.1, SM4500H,B, EPA 120.1, SM2510B, 2540C, 2340B, 2320B, 4500CL-E, 4500F-BC, 426C, SM4500NH3-BH, (EPA 350.1 for: Ammonia-N), LACHAT 10-107-06-1-B for Ammonia-N, SM4500NO3-F, 353.2 for Nitrate-N, SM4500NH3-BC-NES, EPA 351.1, SM4500P-E, 4500P-B,E, 5220D, EPA 410.4, SM 5210B, 5310C, 4500CL-D, EPA 1664, SM14 510AC, EPA 420.1, SM4500-CN-CE, SM2540D.

Organic Parameters: (EPA 624 for Volatile Halocarbons, Volatile Aromatics),(608 for: Chlordane, Aldrin, Dieldrin, DDD, DDE, DDT, Heptachlor, Heptachlor Epoxide, PCBs-Water), (EPA 625 for SVOC Acid Extractables and SVOC Base/Neutral Extractables), 600/4-81-045-PCB-Oil. Microbiology Parameters: (ColilertQT SM9223B;Enterolert-QT: SM9222D-MF.)

New Hampshire Department of Environmental Services Certificate/Lab ID: 200307. NELAP Accredited.

Drinking Water (Inorganic Parameters: SM 9222B, 9223B, 9215B, EPA 200.7, 200.8, 245.2, 300.0, SM4500CN-E, 4500H+B, 4500NO3-F, 2320B, 2510B, 2540C, 4500F-C, 5310C, 2120B, EPA 332.0. Organic Parameters: 504.1, 524.2.)

Non-Potable Water (Inorganic Parameters: SM9222D, 9221B, 9222B, 9221E-EC, EPA 3005A, 200.7, 200.8, 245.1, 245.2, SW-846 6010B, 6020, 7196A, 7470A, SM3500-CR-D, EPA 120.1, 300.0, 350.1, 351.1, 353.2, 410.4, 420.1, 1664A, SW-846 9010, 9030, 9040B, 9050A, SM426C, SM2120B, 2310B, 2320B, 2540B, 2540D, 4500H+B, 4500CL-E, 4500CN-E, 4500NH3-H, 4500NO3-F, 4500NO2-B, 4500P-E, 4500-S2-D, 5210B, 5220D, 2510B, 2540C, 4500F-C, 5310C, 5540C, LACHAT 10-204-00-1-A, LACHAT 10-107-06-2-D. Organic Parameters: SW-846 3510C, 5030B, 8260B, 8270C, 8330, EPA 624, 625, 608, SW-846 8082, 8081A, 8151A.)

Solid & Chemical Materials (Inorganic Parameters: SW-846 6010B, 7196A, 7471A, 1010, 1030, 9010, 9012A, 9014, 9030B, 9040B, 9045C, 9050C, 9065,1311, 1312, 3005A, 3050B. Organic Parameters: SW-846 3540C, 3546, 3580A, 5030B, 5035, 8260B, 8270C, 8330, 8151A, 8015B, 8082, 8081A.)

New Jersey Department of Environmental Protection Certificate/Lab ID: MA935. NELAP Accredited.

Drinking Water (Inorganic Parameters: SM9222B, 9221E, 9223B, 9215B, 4500CN-CE, 4500NO3-F, 4500F-C, EPA 300.0, 200.7, 200.8, 245.2, 2540C, SM2120B, 2320B, 2510B, 5310C, SM4500H-B. Organic Parameters: EPA 332, 504.1, 524.2.)

Non-Potable Water (Inorganic Parameters: SM5210B, EPA 410.4, SM5220D, 4500Cl-E, EPA 300.0, SM2120B, SM4500F-BC, EPA 200.7, 351.1, LACHAT 10-107-06-2-D, EPA 353.2, SM4500NO3-F, 4500NO2-B, EPA 1664A, SM5310B, C or D, 4500-PE, EPA 420.1, SM510ABC, SM4500P-B5+E, 2540B, 2540C, 2540D, EPA 120.1, SM2510B, SM15 426C, 9222D, 9221B, 9221C, 9221E, 9222B, 9215B, 2310B, 2320B, 4500NH3-H, 4500-S D, EPA 350.1, 350.2, SW-846 1312, 6020, 7470A, 5540C, 4500H-B, EPA 200.8, SM3500Cr-D, 4500CN-CE, EPA 245.1, 245.2, SW-846 9040B, 3005A, EPA 6010B, 7196A, SW-846 9010B, 9030B. Organic Parameters: SW-846 8260B, 8270C, 8270C-SIM, 3510C, EPA 608, 624, 625, SW-846 3630C, 5030B, 8081A, 8082, 8151A, 8330, NJ OQA-QAM-025 Rev.7, NJ EPH.)

Solid & Chemical Materials (Inorganic Parameters: SW-846, 6010B, 7196A, 9010B, 9030B, 1010, 1030, 1311, 1312, 3005A, 3050B, 7471A, 9014, 9012A, 9040B, 9045C, 9050A, 9065. Organic Parameters: SW-846 8015B, 8081A, 8082, 8151A, 8330, 8260B, 8270C, 8270C-SIM, 3540C, 3545, 3546, 3550B, 3580A, 3630C, 5030B, 5035L, 5035H, NJ OQA-QAM-025 Rev.7, NJ EPH.)

New York Department of Health Certificate/Lab ID: 11148. NELAP Accredited.

Drinking Water (Inorganic Parameters: SM9223B, 9222B, 9215B, EPA 200.8, 200.7, 245.2, SM5310C, EPA 332.0, SM2320B, EPA 300.0, SM2120B, 4500CN-E, 4500F-C, 4500H-B, 4500NO3-F, 2540C, SM 2510B. Organic Parameters: EPA 524.2, 504.1.)

Non-Potable Water (Inorganic Parameters: SM9221E, 9222D, 9221B, 9222B, 9215B, 5210B, 5310C, EPA 410.4, SM5220D, 2310B-4a, 2320B, EPA 200.7, 300.0, SM4500CL-E, 4500F-C, SM15 426C, EPA 350.1, SM4500NH3-BH, EPA 351.1, LACHAT 10-107-06-2, EPA 353.2, LACHAT 10-107-04-1-C, SM4500-NO3-F, 4500-NO2-B, 4500P-E, 2540C, 2540B, 2540D, EPA 200.8, EPA 6010B, 6020, EPA 7196A, SM3500Cr-D, EPA 245.1, 245.2, 7470A, SM2120B, LACHAT 10-204-00-1-A, EPA 9040B, SM4500-HB, EPA 1664A, EPA 420.1, SM14 510C, EPA 120.1, SM2510B, SM4500S-D, SM5540C, EPA 3005A, 9010B, 9030B.. Organic Parameters: EPA 624, 8260B, 8270C, 625, 608, 8081A, 8151A, 8330, 8082, EPA 3510C, 5030B.)

Solid & Hazardous Waste (Inorganic Parameters: 1010, 1030, EPA 6010B, 7196A, 7471A, 9012A, 9014, 9040B, 9045C, 9065, 9050, EPA 1311, 1312, 3005A, 3050B, 9010B, 9030B. Organic Parameters: EPA 8260B, 8270C, 8015B, 8081A, 8151A, 8330, 8082, 3540C, 3545, 3546, 3580, 5030B, 5035.)

North Carolina Department of the Environment and Natural Resources Certificate/Lab ID: 666. Organic Parameters: MA-EPH, MA-VPH.

Pennsylvania Department of Environmental Protection Certificate/Lab ID: 68-03671. *NELAP Accredited. Drinking Water* (Organic Parameters: EPA 524.2)

Non-Potable Water (Inorganic Parameters: EPA 1312. Organic Parameters: EPA 3510C, 5030B, 625, 624, 608, 8081A, 8082, 8151A, 8260B, 8270C, 8330)

Solid & Hazardous Waste (Inorganic Parameters: EPA 350.1, 1010, 1030, 1311, 1312, 3050B, 6010B, 7196A, 7471A, 9010B, 9012A, 9014, 9040B, 9045C, 9050, 9065, SM 4500NH3-H. Organic Parameters: 3540C, 3545, 3546, 3550B,

3580A, 3630C, 5035, 8015B, 8081A, 8082, 8151A, 8260B, 8270C, 8330)

Rhode Island Department of Health <u>Certificate/Lab ID</u>: LAO00065. *NELAP Accredited via NY-DOH*. Refer to MA-DEP Certificate for Potable and Non-Potable Water. Refer to NJ-DEP Certificate for Potable and Non-Potable Water.

Texas Commisson on Environmental Quality <u>Certificate/Lab ID</u>: T104704476-09-1. **NELAP Accredited.** Non-Potable Water (<u>Inorganic Parameters</u>: EPA 120.1, 1664, 200.7, 200.8, 245.1, 245.2, 300.0, 350.1, 351.1, 353.2, 376.2, 410.4, 420.1, 6010, 6020, 7196, 7470, 9040, SM 2120B, 2310B, 2320B, 2510B, 2540B, 2540C, 2540D, 426C, 4500CL-E, 4500CN-E, 4500F-C, 4500H+B, 4500NH3-H, 4500NO2B, 4500P-E, 4500 S2⁻ D, 510C, 5210B, 5220D, 5310C, 5540C. Organic Parameters: EPA 608, 624, 625, 8081, 8082, 8151, 8260, 8270, 8330.)

Solid & Hazardous Waste (Inorganic Parameters: EPA 1311, 1312, 9012, 9014, 9040, 9045, 9050, 9065.)

Department of Defense Certificate/Lab ID: L2217.

Drinking Water (Inorganic Parameters: SM 4500H-B. Organic Parameters: EPA 524.2, 504.1.)

Non-Potable Water (Inorganic Parameters: EPA 200.7, 200.8, 6010B, 6020, 245.1, 245.2, 7470A, 9040B, 300.0, 332.0, 6860, 353.2, 410.4, 9060, 1664A, SM 4500CN-E, 4500H-B, 4500NO3-F, 5220D, 5310C, 2320B, 2540C, 3005A, 3015, 9010B, 9056. Organic Parameters: EPA 8260B, 8270C, 8330A, 625, 8082, 8081A, 3510C, 5030B, MassDEP EPH, MassDEP VPH.)

Solid & Hazardous Waste (Inorganic Parameters: EPA 200.7, 6010B, 7471A, 9010, 9012A, 6860, 1311, 1312, 3050B, 7196A, 9010B, 3500-CR-D, 4500CN-CE, 2540G, Organic Parameters: EPA 8260B, 8270C, 8330A/B-prep, 8082, 8081A, 3540C, 3546, 3580A, 5035A, MassDEP EPH, MassDEP VPH.)

Analytes Not Accredited by NELAP

Certification is not available by NELAP for the following analytes: **EPA 8260B**: Freon-113, 1,2,4,5-Tetramethylbenzene, 4-Ethyltoluene. **EPA 8330A**: PETN, Picric Acid, Nitroglycerine, 2,6-DANT, 2,4-DANT. **EPA 8270C**: Methyl naphthalene, Dimethyl naphthalene, Total Methylnapthalenes, Total Dimethylnaphthalenes, 1,4-Diphenylhydrazine (Azobenzene). **EPA 625**: 4-Chloroaniline. **EPA 350.1** for Ammonia in a Soil matrix.

Certificate/Approval Program Summary

Last revised March 3, 2011 - Mansfield Facility

The following list includes only those analytes/methods for which certification/approval is currently held. For a complete listing of analytes for the referenced methods, please contact your Alpha Customer Service Representative.

Connecticut Department of Public Health Certificate/Lab ID: PH-0141.

Wastewater/Non-Potable Water (Inorganic Parameters: pH, Turbidity, Conductivity, Alkalinity, Aluminum, Antimony, Arsenic, Barium, Beryllium, Boron, Cadmium, Calcium, Chromium, Cobalt, Copper, Iron, Lead, Magnesium, Manganese, Mercury, Molybdenum, Nickel, Potassium, Selenium, Silver, Sodium, Strontium, Thallium, Tin, Vanadium, Zinc, Total Residue (Solids), Total Suspended Solids (non-filterable), Total Cyanide. Organic Parameters: PCBs, Organochlorine Pesticides, Technical Chlordane, Toxaphene, Acid Extractables, Benzidines, Phthalate Esters, Nitrosamines, Nitroaromatics & Isophorone, PAHs, Haloethers, Chlorinated Hydrocarbons, Volatile Organics.)

Solid Waste/Soil (Inorganic Parameters: pH, Aluminum, Antimony, Arsenic, Barium, Beryllium, Cadmium, Calcium, Chromium, Hexavalent Chromium, Cobalt, Copper, Iron, Lead, Magnesium, Manganese, Mercury, Molybdenum, Nickel, Potassium, Selenium, Silver, Sodium, Thallium, Vanadium, Zinc, Total Organic Carbon, Total Cyanide, Corrosivity, TCLP 1311. Organic Parameters: PCBs, Organochlorine Pesticides, Technical Chlordane, Toxaphene, Volatile Organics, Acid Extractables, Benzidines, Phthalates, Nitrosamines, Nitroaromatics & Cyclic Ketones, PAHs, Haloethers, Chlorinated Hydrocarbons.)

Florida Department of Health Certificate/Lab ID: E87814. NELAP Accredited.

Non-Potable Water (Inorganic Parameters: SM2320B, SM2540D, SM2540G.)

Solid & Chemical Materials (Inorganic Parameters: 6020, 7470, 7471, 9045. Organic Parameters: EPA 8260, 8270, 8082, 8081.)

Air & Emissions (EPA TO-15.)

Louisiana Department of Environmental Quality Certificate/Lab ID: 03090. NELAP Accredited.

Non-Potable Water (Inorganic Parameters: EPA 180.1, 245.7, 1631E, 3020, 6020A, 7470A, 9040, 9050A, SM2320B, 2540D, 2540G, 4500H-B, Organic Parameters: EPA 3510C, 3580A, 3630C, 3640A, 3660B, 3665A, 5030B, 8015D, 3570, 8081B, 8082A, 8260B, 8270C.)

Solid & Chemical Materials (Inorganic Parameters: EPA 1311, 3050, 3051A, 3060A, 6020A, 7196A, 7470A, 7471B, 7474, 9040B, 9045C, 9060. Organic Parameters: EPA 3540C, 3570B, 3580A, 3630C, 3640A, 3660, 3665A, 5035, 8015D, 8081B, 8082A, 8260B, 8270C.)

Biological Tissue (Inorganic Parameters: EPA 6020A. Organic Parameters: EPA 3570, 3510C, 3610B, 3630C, 3640A, 8270C.)

Air & Emissions (EPA TO-15.)

New Hampshire Department of Environmental Services Certificate/Lab ID: 2206. NELAP Accredited.

Non-Potable Water (Inorganic Parameters: EPA, 245.1, 245.7, 1631E, 180.1, 6020A, 7470A, 9040B, 9050A, SM2540D, 2540G, 4500H+B, 2320B. Organic Parameters: EPA 8081, 8082, 8260B, 8270C.)

Solid & Chemical Materials (Inorganic Parameters: SW-846 1311, 1312, 3050B, 3051A, 3060A, 6020A, 7470A, 7471A, 9040B, 9045C, 7196A. Organic Parameters: SW-846 3540C, 3580, 3630C, 3640A, 3660B, 3665A, 5035, 8260B, 8270C, 8015D, 8082, 8081A.)

New Jersey Department of Environmental Protection Certificate/Lab ID: MA015. NELAP Accredited.

Non-Potable Water (Inorganic Parameters: SW-846 1312, 3010, 3020A, 3015, SM2320B, EPA 200.8, SM2540D, 2540G, EPA 120.1, SM2510B, EPA 180.1, 245.1, 1631E, SW-846 7470A, 9040B, 6020, 9010B, 9014 Organic Parameters: SW-846 3510C, 3580A, 5030B, 5035L, 5035H, 3630C, 3640C, 3660B, 3665A, 8015B 8081A, 8082, 8260B, 8270C)

Solid & Chemical Materials (Inorganic Parameters: SW-846 6020, 9010B, 9014, 1311, 1312, 3050B, 3051, 3060A, 7196A, 7470A, 7471A, 9040B, 9045C, 9060. Organic Parameters: SW-846 3540C, 3570, 3580A, 5030B, 5035L, 5035H, 3630C, 3640A, 3660B, 3665A, 8081A, 8082, 8260B, 8270C, 8015B.)

Atmospheric Organic Parameters (EPA TO-15)

Biological Tissue (Inorganic Parameters: SW-846 6020 Organic Parameters: SW-846 8270C, 3510C, 3570, 3630C, 3640A)

New York Department of Health Certificate/Lab ID: 11627. NELAP Accredited.

Non-Potable Water (<u>Inorganic Parameters</u>: SM2320B, SM2540D, EPA 200.8, 6020, 1631E, 245.1, 9014, 9040B, 120.1, SM2510B, 4500CN-E, 4500H-B, EPA 376.2, 180.1, 9010B. <u>Organic Parameters</u>: EPA 8260B, 8270C, 8081A, 8082, 3510C, 5030B.)

Solid & Hazardous Waste (Inorganic Parameters: EPA 6020, 7196A, 3060A, 7471A, 7474, 9014, 9040B, 9045C, 9010B. Organic Parameters: EPA 8260B, 8270C, 8081A, DRO 8015B, 8082, 1311, 1312, 3050B, 3580, 3570, 3051, 5030B.)

Air & Emissions (EPA TO-15.)

Rhode Island Department of Health Certificate/Lab ID: LAO00299. NELAP Accredited via LA-DEQ.

Refer to LA-DEQ Certificate for Non-Potable Water.

Texas Commission of Environmental Quality Certificate/Lab ID: T104704419-08-TX. NELAP Accredited.

Solid & Chemical Materials (Inorganic Parameters: EPA 6020, 7470, 7471, 1311, 7196, 9014, 9040, 9045, 9060. Organic Parameters: EPA 8015, 8270, 8260, 8081, 8082.)

Air (Organic Parameters: EPA TO-15)

Washington State Department of Ecology <u>Certificate/Lab ID</u>: C954. *Non-Potable Water* (<u>Inorganic Parameters</u>: SM2540D, 2510B, EPA 120.1, 180.1, 1631E, 245.7.)

Solid & Chemical Materials (Inorganic Parameters: EPA 9040, 9060, 6020, 7470, 7471, 7474. Organic Parameters: EPA 8081, 8082, 8015 Mod, 8270, 8260.)

U.S. Army Corps of Engineers

Department of Defense Certificate/Lab ID: L2217.01.

Non-Potable Water (Inorganic Parameters: EPA 6020A, SM4500H-B. Organic Parameters: 3020A, 3510C, 5030B, 8260B, 8270C, 8270C-ALK-PAH, 8082, 8081A, 8015D-SHC.)

Solid & Hazardous Waste (Inorganic Parameters: EPA 1311, 1312, 3050B, 6020A, 7471A, 9045C, 9060, SM 2540G, ASTM D422-63. Organic Parameters: EPA 3580A, 3570, 3540C, 5035A, 8260B, 8270C, 8270-ALK-PAH, 8082, 8081A, 8015D-SHC, 8015-DRO.

Air & Emissions (EPA TO-15.)

Analytes Not Accredited by NELAP

Certification is not available by NELAP for the following analytes: 8270C: Biphenyl.

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